

# Appendix B

# **Exhibit 23**

(UNREDACTED VERSION OF  
DOCUMENT SOUGHT TO BE  
SEALED)

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Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V., )  
U.S. PHILIPS CORPORATION, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
ASUSTEK COMPUTER, INC., )  
ASUS COMPUTER INTERNATIONAL, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case No: 15-1125-GMS

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Videotaped Deposition of SHUNWEN HUANG

VOLUME I

Taipei, Taiwan

Monday, November 13, 2017

Reported by:

Mark McClure, CRR, CSR No. 12203

Job no: 19927

## HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY

Page 2	Page 4
<p>1 2 3 4 November 13, 2017 5 10:03 a.m. 6 7 8 9 10 Videotaped deposition of SHUNWEN HUANG, Volume 11 I, in his personal capacity and as Person Most 12 Knowledgeable, Asustek Computer, Inc., Asus Computer 13 International, held at Shangri-La's Far Eastern Plaza 14 Hotel, 201 Tun Hwa South Road, Section 2, Taipei, 10675, 15 Taiwan, pursuant to Notice before MARK MCCLURE, 16 Certified Shorthand Reporter in and for the State of 17 California, No. 12203, Certified Realtime Reporter. 18 19 20 21 22 23 24 25</p>	<p>1 2 INDEX 3 WITNESS EXAMINATION PAGE 4 SHUNWEN HUANG 5 BY MR. GERSON 6 6 7 8 EXHIBITS 9 10 NUMBER DESCRIPTION PAGE 11 Exhibit 1 30(b)(6) Notice of Deposition 26 12 Exhibit 2 Notice of Depositions 70 13 Exhibit 3 Nexus 7 specifications, Bates 74 ASUSPH_00000079 - 0082 14 15 Exhibit 4 Asus ZenPad 8.0 specifications, 86 Bates ASUSPH_00025666 - 5667 16 Exhibit 5 Nexus 7 Guidebook, Bates 89 AUSPH_00016383 - 6464 17 18 Exhibit 6 Asus Tablet eManual, Bates 91 AUSUPH_00029755 - 9860 19 20 Exhibit 7 Asus Nexus device (retained by 100 Mr. Gerson) 21 Exhibit 8 Asus ZenPad device (retained by 103 Mr. Gerson) 22 23 24 25</p>
Page 3	Page 5
<p>1 APPEARANCES: 2 3 FITZPATRICK, CELLA, HARPER &amp; SCINTO Attorneys for Plaintiff 4 BY: CHRISTOPHER M. GERSON, ESQ. DANIEL APGAR, ESQ. 5 1290 Avenue of the Americas New York, New York 10104 6 (212) 218-2306 cgerson@fchs.com dapgar@fchs.com 7 8 9 ALSTON &amp; BIRD, LLP Attorneys for Asus Defendants 10 BY: MICHAEL LEE, ESQ. 2828 North Harwood Street, Suite 1800 11 Dallas, Texas 75201-2139 (214) 922-3464 michael.lee@alston.com 12 13 WILLIAMS &amp; CONNOLLY LLP Attorneys for Asus Defendants 14 BY: DAVID KRINSKY, ESQ. 725 Twelfth Street, N.W. 15 Washington, D.C. 20005 (202) 434-5000 16 17 18 19 Also Present: 20 Michael Zhu - Main Interpreter 21 22 Mark Cheng - Check Interpreter 23 24 Yuriko Hwang - Legal Video Specialist 25 TransPerfect Legal Solutions James Liu - Asus Sean Lai - Asus</p>	<p>1 VIDEOGRAPHER: This is tape No. 1 of the video 2 deposition of Shunwen Huang in the matter of Koninklijke 3 Philips N.V., U.S. Philips Co., versus Asustek Computer 4 Inc., Asus Computer International, et al., in the U.S. 5 District Court for the District of Delaware, 6 No. 15-1125-GMS. 7 This deposition is being held at Shangri-La's 8 Far Eastern Plaza Hotel, 201 Dun Hua South Road, Section 9 2, Taipei, Taiwan 10675, on November 13, 2017, at 10 approximately 10:03. 11 My name is Yuriko Hwang, from the firm 12 Transperfect Legal Solutions, and I am the legal video 13 specialist. 14 The court reporter is Mark McClure, in 15 association with Transperfect Legal Solutions. 16 Will counsel please introduce themselves. 17 MR. GERSON: This is Christopher Gerson, from 18 the law firm of Fitzpatrick, Cella, Harper &amp; Scinto, and 19 I'm representing the Philips plaintiffs. 20 MR. APGAR: Dan Apgar, also from the law firm 21 of Fitzpatrick, Cella, Harper &amp; Scinto, also 22 representing Philips. 23 MR. LEE: Michael Lee, with Alston &amp; Bird, 24 representing the Asus defendants. 25 MR. KRINSKY: David Krinsky, of Williams &amp;</p>

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Page 14

1 A. It's Google's web browser.  
 2 Q. Chrome is Google's web browser?  
 3 A. Chrome is Google's web browser.  
 4 Q. And you install Google's web browser onto  
 5 Android devices, correct?  
 6 A. Correct.  
 7 Q. Do all of the Asus Android devices that you  
 8 work on include the Chrome web browser from Google?  
 9 A. To my knowledge, yes.  
 10 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 18 Q. But do all of the Asus Android devices that  
 19 you are aware of include YouTube preinstalled?  
 20 A. The ones I worked on, yes.  
 21 Q. Are you aware of any Asus Android devices that  
 22 do not have YouTube preinstalled?  
 23 A. I don't know any.  
 24 Q. So sitting here today, as far as you know, all  
 25 Asus Android devices in fact have YouTube, correct?

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1 MR. LEE: Objection to form.  
 2 A. I only know that with respect with the  
 3 projects I was involved in, they had YouTube.  
 4 Q. All of them had YouTube, correct?  
 5 MR. LEE: Objection to form.  
 6 A. To my recollection, yes.  
 7 Q. And do you work on the application Google Play  
 8 Movies?  
 9 A. Yes.  
 10 Q. Is Google Play Movies also preinstalled on all  
 11 of the Asus Android devices that you are aware of?  
 12 MR. LEE: Objection to form.  
 13 A. The projects I was involved in, to my  
 14 recollection, that's the case.  
 15 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 22 MR. LEE: Objection to form.

Page 16

1 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 5 MR. LEE: Objection to form.  
 6 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 10 MR. LEE: Objection to form.  
 11 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 19 MR. LEE: Objection to form.  
 20 [REDACTED]  
 21 Q. Do you work on the Gmail application and the  
 22 installation of Gmail on Asus's Android devices?  
 23 MR. LEE: Objection to form.  
 24 A. Yes.  
 25 Q. And have all the devices you've worked on

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1 which are Asus Android devices have included Gmail?  
 2 A. As far as I can recall, the project I worked  
 3 on all had Gmail.  
 4 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 7 MR. LEE: Objection to form.  
 8 [REDACTED]  
 9 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 12 MR. LEE: Objection to form.  
 13 [REDACTED]  
 14 [REDACTED]  
 [REDACTED]  
 16 MR. LEE: Objection to form.  
 17 [REDACTED]  
 18 Q. Do you work on the installation of Google Maps  
 19 onto Asus's Android devices?  
 20 A. Yes.  
 21 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

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1 Q. So for now it's fair to say, and maybe we can  
2 revisit this a little later, but it's fair to say that  
3 you have worked on other devices besides the ones you  
4 just mentioned?

5 A. Correct.

6 Q. I guess starting with FLAC, how is it that you  
7 know that the Asus projects you've worked on can play  
8 back FLAC files?

9 A. To my knowledge, Google provides the FLAC  
10 feature.

11 [REDACTED]

12 [REDACTED]

13 MR. LEE: Objection to form.

14 [REDACTED]

15 Q. So the ability to play FLAC files would then  
16 be something -- that functionality is something that's  
17 provided by Google for Asus's Android devices, correct?

18 A. To my knowledge, most of them, yes.

19 Q. And is it the same for AMR wideband, the  
20 ability to play back AMR wideband files, is  
21 that -- strike that.

22 I apologize. How do you know that the Asus  
23 Android devices that you have worked on can play back  
24 AMR wideband audio files?

25 A. Google provided such a feature.

Page 35

1 [REDACTED]

2 [REDACTED]

3 MR. LEE: Objection to form.

4 [REDACTED]

5 Q. Let's turn back. I apologize for jumping  
6 around. Let's turn back to the topics for which you've  
7 been designated.

8 Do you also understand that you are designated  
9 to testify about how a user can zoom in on content  
10 that's displayed on an Asus Android device?

11 MR. LEE: Objection to form.

12 A. Later on I will testify regarding this topic.

13 Q. And you understand that you are here to  
14 testify on Asus's behalf for that topic?

15 A. Yes.

16 Q. And then do you understand that you are here  
17 to testify about Asus's Android devices' compliance with  
18 Android compatibility definition documents?

19 MR. LEE: Objection to form.

20 A. Later on I will also testify on this topic.

21 Q. Thank you. And you understand that your  
22 testimony will be on behalf of Asus for that topic,  
23 correct?

24 A. Yes.

25 Q. And then do you understand that you're here to

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1 testify about the testing of Asus's Android products  
2 with the compatibility test suite?

3 A. Are you talking about CTS?

4 Q. I am, yes.

5 A. Later on I will also testify on this topic.

6 Q. And just so I understand, what's your  
7 understanding of CTS?

8 A. It is an automatic testing tool provided by  
9 Google.

10 Q. And I think I skipped one. Do you understand  
11 that you are here -- strike that.

12 Do you understand that you are designated to  
13 testify about the use of HDCP 2.x in Asus's Android  
14 devices?

15 MR. LEE: Objection to form.

16 A. Later on I will testify on this topic.

17 Q. And do you understand that your testimony will  
18 be on behalf of Asus for that topic, correct?

19 A. Yes.

20 Q. So I think you started to tell me about what  
21 you did to prepare for today's deposition, and you  
22 mentioned that you received this document and then you  
23 spoke with some folks at Asus; is that correct?

24 A. Yes.

25 Q. And so who did you speak with?

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1 A. I spoke with Tingyi, T-i-n-g-y-i.

2 Q. I apologize. Is Tingyi a man or a woman? I  
3 just want to make sure I say the right mister or missus.

4 A. A man.

5 Q. What did you speak with Mr. Yi about?

6 A. I asked him about the source of AMR wideband,  
7 FLAC, and HDCP 2.x.

8 Q. When you say the "source," what do you mean by  
9 that?

10 A. The provider.

11 Q. Who provides that functionality for Asus's  
12 products? Is that what you mean by "source"?

13 A. Correct.

14 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Page 38

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 MR. LEE: Objection to form.  
 11 A. I don't have a recollection.  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 MR. LEE: Same objection.  
 16 [REDACTED]  
 17 [REDACTED]  
 18 Q. Did you talk to Mr. Yi about anything else  
 19 besides the sources of AMR wideband, FLAC and HDCP 2.x?  
 20 A. Let me think about it.  
 21 Q. Sure. And take whatever time you need to  
 22 think about it.  
 23 A. There's also MPEG-DASH.  
 24 [REDACTED]  
 25 [REDACTED]

Page 39

1 [REDACTED]  
 2 [REDACTED]  
 3 MR. LEE: Objection to form.  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 MR. LEE: Objection to form.  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 MR. LEE: Objection to form.  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 MR. LEE: Objection to form.  
 22 [REDACTED]  
 23 Q. Did Mr. Yi tell you anything else that we  
 24 haven't gone over so far today?  
 25 A. (In English) Let me check.

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1 (In Mandarin) I think these are the ones.  
 2 Q. Thank you.  
 3 So aside from Mr. Yi, who else did you speak  
 4 with in preparing for this deposition?  
 5 A. Tery.  
 6 Q. T-e-r-r-y?  
 7 A. T-e-r-y.  
 8 Q. T-e-r-y. Is that first name?  
 9 A. (In English) First name, yeah, his first name.  
 10 Q. Do you know Tery's last name?  
 11 A. (In English) Last name is Lin, L-i-n.  
 12 Q. And is it Mr. Lin or Mrs. Lin? I apologize  
 13 for asking.  
 14 A. Mr. Lin.  
 15 Q. Thank you.  
 16 So what did you speak with Mr. Lin about?  
 17 A. Rotation.  
 18 Q. When you say rotation, do you mean the screen  
 19 reorientation, the way Asus's Android devices rotated?  
 20 MR. LEE: Objection to form.  
 21 A. (In English) Let me check.  
 22 (In Mandarin) I think it is one of the topics  
 23 in here.  
 24 Q. Mr. Huang, let me try to help you. If you can  
 25 refer to page 2, it's labeled page 2, and item No. 18.

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1 A. (In English) Yes.  
 2 Q. Is that what you were referring to?  
 3 A. Yeah.  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 MR. LEE: Objection to form.  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 MR. LEE: Objection to form.  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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IN THE UNITED STATES DISTRICT COURT.  
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V., )  
U.S. PHILIPS CORPORATION, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
ASUSTEK COMPUTER, INC. )  
ASUS COMPUTER INTERNATIONAL, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Case No: 15-1170-GMS

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Videotaped Deposition of SHUNWEN HUANG

Volume II

Taipei, Taiwan

Tuesday, November 14, 2017

Reported by:

Mark McClure, CRR, CSR No. 12203

Job no: 19928



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<p>1</p> <p>2</p> <p>3</p> <p>4 November 14, 2017</p> <p>5 10:03 a.m.</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 Videotaped deposition of SHUNWEN HUANG, VOLUME</p> <p>11 II, in his personal capacity and as Person Most</p> <p>12 Knowledgeable, AsusTek, held at Shangri-La's Far Eastern</p> <p>13 Plaza Hotel, 201 Tun Hua South Road, Section 2, Taipei,</p> <p>14 10675, Taiwan, pursuant to Notice before MARK MCCLURE,</p> <p>15 Certified Shorthand Reporter in and for the State of</p> <p>16 California, No. 12203, Certified Realtime Reporter.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2</p> <p>3 WITNESS EXAMINATION PAGE</p> <p>4 SHUNWEN HUANG</p> <p>5 BY MR. GERSON 130</p> <p>6</p> <p>7</p> <p>8</p> <p>9 EXHIBITS</p> <p>10</p> <p>11 NUMBER DESCRIPTION PAGE</p> <p>12 Exhibit 9 Mobile Application Distribution 185</p> <p>13 Agreement, Bates ASUPH_00033285 -</p> <p>14 3306</p> <p>15 Exhibit 10 MeMO Pad e-Manual, Bates 218</p> <p>16 AUSUPH_00016291 - 6382</p> <p>17 Exhibit 11 Compatibility Definition, Android 222</p> <p>18 6.0, Bates ASUSPH_00054797 - 4870</p> <p>19 Exhibit 12 Compatibility Definition, Android 235</p> <p>20 7.0, Bates ASUSPH_00061074 - 1158</p> <p>21 Exhibit 13 Android 4.0 Compatibility 236</p> <p>22 document, Bates ASUSPH_00107548 -</p> <p>23 7573</p> <p>24 Exhibit 14 Compatibility Definition, Android 237</p> <p>25 5.1, Bates ASUPH_00060151 - 0212</p> <p>Exhibit 15 Spreadsheet, Bates 238</p> <p>ASUSPH_00047722</p>
<p>Page 127</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 FITZPATRICK, CELLA, HARPER &amp; SCINTO</p> <p>4 Attorneys for Plaintiff</p> <p>5 BY: CHRISTOPHER M. GERSON, ESQ.</p> <p>6 DANIEL A. APGAR, ESQ.</p> <p>7 1290 Avenue of the Americas</p> <p>8 New York, New York 10104</p> <p>9 (212) 218-2306</p> <p>10 cgeron@fchs.com</p> <p>11 dapgar@fchs.com</p> <p>12 ALSTON &amp; BIRD, LLP</p> <p>13 Attorneys for Asus Defendant</p> <p>14 BY: MICHAEL LEE, ESQ.</p> <p>15 2828 North Harwood Street, Suite 1800</p> <p>16 Dallas, Texas 75201-2139</p> <p>17 (214) 922-3409</p> <p>18 michael.lee@alston.com</p> <p>19 WILLIAMS &amp; CONNOLLY, LLP</p> <p>20 Attorneys for Asus Defendant</p> <p>21 BY: DAVID KRINSKY, ESQ.</p> <p>22 725 Twelfth Street, N.W.</p> <p>23 Washington, D.C. 20005</p> <p>24 (202) 434-5000</p> <p>25 dkrinsky@wc.com</p> <p>Also Present:</p> <p>Michael Zhu - Main Interpreter</p> <p>Mark Cheng - Check Interpreter</p> <p>Yuriko Hwang - Legal Video Specialist</p> <p>TransPerfect Legal Solutions</p> <p>Ricky Liao - Asus</p> <p>Darren Lee - Asus</p>	<p>Page 129</p> <p>1 VIDEOGRAPHER: This is tape No. 1 of the</p> <p>2 videotape deposition of Shunwen Huang, Volume II, in the</p> <p>3 matter of Koninklijke Philips N.V., U.S. Philips Co.</p> <p>4 versus AsusTek Computer, Inc., Asus Computer</p> <p>5 International, et al., in the U.S. District Court for</p> <p>6 the District of Delaware, No. 15-1125 -GMS.</p> <p>7 This deposition is being held at Shangri-La's</p> <p>8 Far Eastern Plaza Hotel, 201 Dun Hua South Road, Section</p> <p>9 2, Taipei, 10675, on November 14, 2017, at approximately</p> <p>10 10:03.</p> <p>11 My name is Yuriko Hwang, from the firm</p> <p>12 TransPerfect Litigation Solutions and I'm the legal</p> <p>13 video specialist.</p> <p>14 The court reporter is Mark McClure, in</p> <p>15 association with TransPerfect Litigation Solutions.</p> <p>16 Will counsel please introduce themselves.</p> <p>17 MR. GERSON: This is Christopher Gerson. I'm</p> <p>18 from the law firm of Fitzpatrick, Cella, Harper &amp;</p> <p>19 Scinto, and I represent the Philips plaintiffs.</p> <p>20 MR. APGAR: Dan Apgar, also from Fitzpatrick,</p> <p>21 Cella, Harper &amp; Scinto, also representing Philips.</p> <p>22 MR. LEE: Michael Lee, with Alston &amp; Bird,</p> <p>23 representing the Asus defendants.</p> <p>24 MR. KRINSKY: David Krinsky, of Williams &amp;</p> <p>25 Connolly, LLC, also representing the Asus defendants.</p>

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1 It's page 74 of the Nexus 7 guidebook, so it's towards  
2 the back. Please let me know when you're there.

3 A. Are you talking about this page (indicating)?

4 Q. Yes, I am.

5 And as you recall yesterday, we spoke about  
6 the sensors that are listed for the Nexus 7 in the  
7 guidebook.

8 Do you recall that?

9 A. I have a recollection of that.

10 Q. And the first sensor that's listed in the  
11 Nexus 7 guidebook is accelerometer.

12 Do you see that?

13 A. Yes.

14 Q. And so when Mr. Apgar rotated the Nexus 7  
15 device, you agree that the accelerometer sensed that  
16 rotation, correct?

17 MR. LEE: Objection to form.

18 A. I'm not familiar with the principle of  
19 operation of the sensors. Just now, I only saw there  
20 was a motion of rotation.

21 Q. Accelerometers measure acceleration, correct?

22 MR. LEE: Objection. Form.

23 A. To my knowledge, that should be the case.

24 Q. And if a device is still and then it's moving,  
25 that means there was an acceleration on the device,

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1 earlier causing the whole device to have an  
2 acceleration.

3 Q. Including the screen, correct?

4 A. To my understanding, that should be the case.

9 MR. LEE: Objection. Form.

18 MR. LEE: Objection. Form.

24 MR. LEE: Objection. Form.

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1 correct?

2 A. To my understanding, that should be the case.

3 Q. And in the demonstration that we saw from  
4 Mr. Apgar, the device was first still and then it was  
5 moving, correct?

6 A. Yes.

7 Q. And since the accelerometers measure  
8 acceleration, they would sense the acceleration on the  
9 device imparted by Mr. Apgar, is that correct?

10 MR. LEE: Objection to form.

11 A. I think the rotation demonstrate earlier had  
12 acceleration. Whether this gravity sensor received this  
13 event or not, I'm not very sure, but I did see he  
14 performed a rotation, that's correct.

15 Q. And you do agree that the accelerometer and  
16 the other sensors in the Nexus 7 are integrated within  
17 the device, correct?

18 MR. LEE: Objection. Form.

19 A. According to the description in the  
20 specification, it should be included in the device.

21 Q. And when there was the rotation of the device,  
22 the acceleration that we spoke about earlier, the whole  
23 device, including the screen, is accelerating, correct?

24 MR. LEE: Objection. Form.

25 A. To my knowledge, the rotation performed

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7 MR. LEE: Objection to form.

11 Q. And so if we were to look at, for example,  
12 Exhibit 8, which is the other device we looked at  
13 yesterday, you recall that that was the Asus ZenPad 8  
14 device, correct?

15 A. Yes.

16 Q. And we agreed yesterday that the Asus ZenPad  
17 8, which is Exhibit 8, is also an Asus Android device,  
18 right?

19 MR. LEE: Objection to form.

20 A. It appears to be such, yes.

21 Q. And so, therefore, it should have  
22 the -- strike that.

23 You would expect it to have the same screen  
24 reorientation functionality that we saw in the Asus  
25 Nexus 7 device, correct?

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1 Q. Thank you.

2 And so before the break you recall we were  
3 talking about the scrolling functionalities present in  
4 the Asus Nexus 7, correct?

5 A. Yes.

9 MR. LEE: Objection. Form.

13 MR. LEE: Objection. Form.

15 Q. So if we were to look at another Asus Android  
16 device such as the ZenPad which has been marked as  
17 Exhibit 8, it would have that same scrolling  
18 functionality present as well, correct?

19 MR. LEE: Objection to form.

23 Q. And I think yesterday we looked and determined  
24 that it does have Android operating system.  
25 Do you recall that?

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1 A. Yesterday? Which one?

2 Q. So if we could look at Exhibit 8, which is the  
3 ZenPad device, and I'll ask my colleague, Mr. Apgar, to  
4 turn on the device and go to the "About" screen.

5 I believe we looked at this yesterday, but  
6 Mr. Huang, you can confirm that the Asus ZenPad which  
7 has been marked as Exhibit 8 has Android operating  
8 system?

9 A. That's what the device displays, that's  
10 correct.

11 Q. So let's return to Exhibit 7, which is the  
12 Asus Nexus device. And Mr. Huang, do you see that once  
13 again my colleague, Mr. Apgar, has loaded up the web  
14 browser on the Nexus 7 and it's displaying a web page?

15 A. Yes.

16 Q. And now what I'm going to ask my colleague,  
17 Mr. Apgar, to do is to triple-tap on a location in the  
18 web browser.

19 And Mr. Huang, did you see that the web  
20 browser zoomed in on the web page being displayed after  
21 Mr. Apgar triple-tapped?

22 MR. LEE: Objection. Form.

23 A. According to the demonstration, it appears to  
24 be so.

25 MR. GERSON: And, Mr. Apgar, could you now

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1 click on a selected hyperlink that is being displayed at  
2 this second enlarged scale.

3 MR. LEE: Objection. Form.

4 Q. Mr. Huang, would you agree that Mr. Apgar was  
5 able to click on or, excuse me, tap on a link that was  
6 displayed as part of the zoomed-in version of the web  
7 page and when Mr. Apgar selected that link, a new web  
8 page is loaded?

9 A. According to the demonstration just now, it  
10 appears to be so.

11 MR. GERSON: And so now, Dan, what I'd like  
12 you to do is to use two fingers together to move the web  
13 page and what's displayed on the screen.

14 Q. And, Mr. Huang, you would agree as my  
15 colleague, Mr. Apgar, moved his fingers, what's  
16 displayed in that box on the edge of the screen also  
17 moves?

18 MR. LEE: Objection. Form.

19 A. According to the demonstration just now, the  
20 image on the screen also moved along with the fingers.

21 Q. And Mr. Huang, could you see that there's a  
22 border around what's being displayed on the screen at  
23 the edge of the screen?

24 A. Yes.

25 MR. GERSON: And now, Dan, if you could

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1 triple-tap again to zoom back out.

2 Q. And do you see that once Mr. Apgar zoomed back  
3 out, that there no longer is that border that was  
4 previously displayed?

5 MR. LEE: Objection to form.

6 A. It seems that what he demonstrated was the  
7 whole image on the screen zoomed out.

8 Q. And when we were zoomed in, the image was --  
9 there was a border that surrounded the image, correct, a  
10 colored box?

11 MR. LEE: Objection to form.

12 MR. GERSON: Dan, maybe if you can triple-tap  
13 again.

14 Q. Mr. Huang, do you notice that when the device  
15 zooms in, the zoomed-in image is bordered by a colored  
16 box?

17 A. Are you talking about this, similar to the  
18 blue color?

19 Q. Yes, yes. There is a blue box that surrounds  
20 the zoomed-in image, correct?

21 A. From his demonstration, I do see a blue frame  
22 around the image.

23 Q. There's a blue frame that surrounds the  
24 zoomed-in image, correct?

25 A. Yes.

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1 Q. It's like a window that surrounds the  
2 zoomed-in image, correct?  
3 A. It seems that there's a frame surrounding the  
4 zoomed-in image.  
5 MR. GERSON: And then, Mr. Apgar, if you can  
6 triple-tap to zoom back out.  
7 Q. The blue window that surrounded the image is  
8 no longer there once you zoom back out, correct?  
9 A. From his demonstration, I can tell that the  
10 blue frame disappeared.  
11 Q. Thank you.  
12 And thank you, Dan, you can set the device  
13 aside.

14 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
18 MR. LEE: Objection to form.  
19 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
25 MR. LEE: Objection to form.

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1 [REDACTED]  
2 Q. And when Mr. Apgar triple-tapped and the image  
3 was zoomed in, you agree that the text displayed got  
4 larger, correct?  
5 A. Based on the demonstration just now, it  
6 appears to be so.  
7 Q. And that might be helpful, for example, for  
8 someone with a vision impairment to be better able to  
9 see what's displayed on the screen, correct?  
10 MR. LEE: Objection to form.  
11 A. To my understanding, if a user wants to  
12 enlarge a certain thing, then this is the method used in  
13 Google Android operating system.  
14 MR. LEE: Counsel, just for our better  
15 understanding of what's going on, was there any changes  
16 to the settings in relation to the demonstration you  
17 just did with that device?  
18 MR. GERSON: Oh, that's a good point. We  
19 should ask him about that.  
20 Sorry, Dan, we're going to have to ask you to  
21 demonstrate a little more.  
22 Q. Could you turn back to Exhibit 4, please,  
23 which is the Nexus guidebook. And could you please turn  
24 to the page of Exhibit 4, it's page 68, and it's Bates  
25 stamped ASUSPH\_00016455.

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1 Do you see that this is labeled  
2 "Accessibility"?  
3 A. Yes.  
4 Q. If we turn to the next page, which is Bates  
5 stamped ASUSPH\_00016456.  
6 Do you see that?  
7 A. Yes.  
8 Q. And here I think we talked about this already,  
9 but the Asus user manual teaches that to try  
10 magnification gestures, go to "Settings,"  
11 "Accessibility," "Magnification Gestures."  
12 Do you see that?  
13 MR. LEE: Objection to form.  
14 A. It seems that this document is talking about  
15 that, this.  
16 Q. So if Mr. Apgar could show you the Nexus  
17 device, do you see that what's on there is the  
18 magnification gestures menu which is referenced on page  
19 69 of the Nexus guidebook?  
20 MR. LEE: Objection to form.  
21 A. It seems that what's indicated in this  
22 document is the same thing as shown on the device.  
23 Q. And you'll see that the magnification  
24 gestures, that the option has been turned on on the  
25 Nexus device.

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1 Do you see that?  
2 A. It seems that in this device that option is  
3 turned on.  
4 Q. So you would agree that we were able to use  
5 the instructions provided in the user guide to turn that  
6 feature on, correct?  
7 MR. LEE: Objection to form.  
8 A. It seems that that option can be turned on,  
9 based on the instructions on this document.  
10 Q. And this magnification gesture feature that we  
11 see here and that Mr. Apgar demonstrated, that would  
12 work the same for all Asus Android devices since it's  
13 provided by the Google operating system, correct?  
14 MR. LEE: Objection. Form.  
15 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
25 Q. And so, for example, if we were to look at